

1 WILLIAM H. SHIBLEY
2 California State Bar No. 56093
3 **LLOYD & MOUSILLI, PLLC**
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10 **ATTORNEYS FOR DEFENDANTS**

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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17 **WESTERN DISTRICT**

18 **DAVID HOUGH, et al.**

19 Case No.: 2:24-cv-02886

20 *Plaintiffs,*

21 Assigned for all purposes to:
22 JUDGE WESLEY L. HSU

23 **v.**

24
25 **DECLARATION OF MEGAN**
26 **WEISS ON BEHALF OF LLOYD &**
27 **MOUSILLI, PLLC, IN SUPPORT**
28 **OF MOTION TO RELEASE FUNDS**

18 **RYAN CARROLL, et al.**

19 Hearing: 1/10/2025, 1:30 p.m. PT

20 *Defendants.*

21
22 Action Filed: April 9, 2024
23 Trial Date: N/A

24
25 BEFORE ME, the undersigned authority, on this day personally appeared
26 Megan Weiss, and being duly sworn upon her oath by me, deposed and stated as
27 follows:

28
29 1. "My name is **Megan Weiss**. I am over eighteen (18) years of age, and I have
30 never been convicted of a crime. I am of sound mind and capable of making this
31 Declaration. The facts set forth herein are based on my personal knowledge and are
32 true and correct. I am competent to testify to the facts herein.

1 2. I submit this declaration to provide details regarding the Jurisdictional
2 Defendants' retainer with Lloyd & Mousilli, PLLC ("L&M").

3 3. The purpose of this declaration is to account for the allocation of the \$287,000
4 retainer deposited with L&M, including the matters it was applied to and the
4 portions allocated to attorneys' fees and paralegal fees.

5 4. The retainer was applied to legal services and costs incurred in the following
6 matters:

7 • *Joyce Adams v. Wealth Assistants, LLC*; Cause No. 2024-000377-CA-01; 11th
8 District Court in Miami-Dade County, Florida

9 • *Joyce Adams v. Wealth Assistants, LLC*; American Arbitration Association
10 Case No. 01-23-0005-4383.

11 ○ Attorney hours/fees: 5.3 / \$1,242.50
12 ○ Paralegal hours/fees: 8.6 / \$1,219.17
12 ○ Total fees: \$2,461.67

13 • *Sarah Breen v. Yax Ecommerce, Wealth Assistants, and Ryan Carroll*; Case
14 No. 2024-004122-CA-01; Circuit Court of the 5th Judicial Court in and for Miami-
15 Dade County.

16 ○ Attorney hours/fees: 1.0 / \$360
17 ○ Paralegal hours/fees: 2.41 / \$434.58
17 ○ Total fees: \$659.58

18 • *Benjamin David v. Yax Ecommerce LLC dba Wealth Assistants LLC*;
19 American Arbitration Association Case No. 01-23-0004-9691.

20 ○ Attorney hours/fees: 14.6 / \$4,235.00
21 ○ Paralegal hours/fees: 30.96 / \$4,465
21 ○ Total fees: \$9,887.50

23 • *Tyler Davidson v. Wealth Assistants, LLC; and Ryan Carroll*; Cause No.
24 2023-0028982-CA-01; 11th District Court in and for Miami-Dade County, Florida;

1 • *Tyler Davidson v. Wealth Assistants, LLC; and Ryan Carroll; Arbitration with*
2 *Joseph Huss; Miami-Dade, Florida.*

3 ○ Attorney hours/fees: 52.5 / \$20,015.00
4 ○ Paralegal hours/fees: 108.6 / \$15,992.50
5 ○ Total fees: \$40,765.00

6 • *Jose Delao v. Yax Ecommerce (f/k/a Wealth Assistants LLC; Cause No. 2023-*
7 *8665; 61st Judicial District Court of Harris County, Texas.*

8 ○ Attorney hours/fees: N/A
9 ○ Paralegal hours/fees: 1.56 / \$90.00
10 ○ Total fees: \$90.00

11 • *Robert Harris v. Yax Ecommerce LLC F/K/A Wealth Assistance, LLC; and*
12 *Ryan Carroll; American Arbitration Association Case No. 01-24-0005-8132; Harris*
13 *County, Texas.*

14 ○ Attorney hours/fees: 24.6 / \$8,605.00
15 ○ Paralegal hours/fees: 45.3 / \$6,480.00
16 ○ Total fees: \$ 15,084.17

17 • *David Hough, Amund Thompson; Isabel Ramos; Anthony Ramos; Michael*
18 *Nibarger v. Ryan Carroll; Max K. Day; Max O. Day; Michael Day; Jared Day;*
19 *Matthew Crouch; Christine Carroll; Troy Marchand; Bonnie Nichols; Travis*
20 *Marker; Reyhan Pasinli; Yax Ecommerce, LLC; Precision Trading Group, LLC;*
21 *WA Distribution LLC; Providence Oak Properties, LLC; WA Amazon Seller LLC;*
22 *MKD Investment Advisor, LLC; MKD Family Beneficiary, LLC; MKD Family*
23 *Private Management Company, LLC; Max Day Consulting, LLC; Houtex Farm*
24 *Equity Partners LLC; Business Financial Solutions Advisory LLC; Evo Maxx LLC;*
25 *Yax IP and Management INC (D.B.A. "Fulfillable"); WWKB LLC; Dreams to*
26 *Reality LLC; Quantum Ecommerce, LLC; Wholesale Universe, Inc.; The Law*
27 *Office of Travis R. Marker, A Professional Corporation (d/b/a "Marker Law and*
28 *Mediation"); Parlay Law Group A Professional Corporation; Total-Apps, Inc.;*
29 *Wells Fargo Bank, N.A.; Case No. 2:24-CV-02886; United State District Court for*
30 *the Central District of California, Western Division.*

31 ○ Attorney hours/fees: 184.7 / \$ 71,649.82
32 ○ Paralegal hours/fees: 358.1 / \$ 52,782.50
33 ○ Total fees: \$124,432.32

- 1 • *Individual Claimants v. Yax Ecommerce LLC; Ryan Carroll, Max K. Day,*
2 *Max O. Day. And Michael Day; American Arbitration Association Case No. 01-24-*
3 *0003-2735; Harris County, Texas.*
4 ○ Attorney hours/fees: 3.9 / \$1,365.00
5 ○ Paralegal hours/fees: 5.75 / \$690.00
6 ○ Total fees: \$3,570.00
7
8 • *Maverick Bankcard, Inc. v. WA Distribution; Ryan Carroll; Cause No.*
9 *24VECV00335; In the Superior Court of California County of Los Angeles -*
10 *Unlimited Jurisdiction.*
11
12 • *Maverick Bankcard, Inc. v. WA Distribution; Ryan Carroll; American*
13 *Arbitration Association Case No. 01-24-0008-3850; Los Angeles County,*
14 *California.*
15 ○ Attorney hours/fees: 3.3 / \$1,155.00
16 ○ Paralegal hours/fees: 1.22 / \$90.00
17 ○ Total fees: \$1,245.00
18
19 • *James Packard v. Wealth Assistants, LLC; Arbitration Resolution Services*
20 *Case No C24-00211; Miami-Dade, Florida.*
21 ○ Attorney hours/fees: 4.4 / \$1,540.00
22 ○ Paralegal hours/fees: 7.91 / \$1,160.00
23 ○ Total fees: \$2,700.00
24
25 • *Proficient Supply, LLC. v. Yax Ecommerce, LLC; American Arbitration*
26 *Association Case 01-24-0003-3496; Harris County, Texas.*
27 ○ Attorney hours/fees: 2.3 / \$900
28 ○ Paralegal hours/fees: 30.2 / \$4,274.60
29 ○ Total fees: \$5,174.60
30
31 • *Wealth Assistants LLC v. Proficient Supply LLC; Shawn Chapman; and David*
32 *Arnett; Civil Case No. 4:24-cv-809; United States District Court for the Southern*
33 *District of Texas Houston Division.*
34 ○ Attorney hours/fees: 11.7 / \$4,595.00
35 ○ Paralegal hours/fees: 27.26 / \$3,670.00
36 ○ Total fees: \$8,265.00

- 1 ● *Trevor Red v. Yax Ecommerce LLC, FKA, Wealth Assistants, LLC; and Ryan*
2 *Carroll; Cause No. Case No. 2023-027890-CA-0; 11th District Court in Miami-*
3 *Dade County, Florida.*
4 ○ Attorney hours/fees: 0.7 / \$70.83
5 ○ Paralegal hours/fees: 2.85 / \$420.00
6 ○ Total fees: \$490.83
7 ● *Stacy Rico and Ben Brown v. Ryan Carroll; Cause No. 2023-027448-CA-01;*
8 *11th District Court in and for Miami-Dade County, Florida.*
9 ○ Attorney hours/fees: Pending Invoice
10 ○ Paralegal hours/fees: 9.03 / \$1,200.00
11 ○ Total fees: \$1,200.00
12 ● *Brett and Jennifer Sanner v. Yax Ecommerce DBA Wealth Assistants LLC;*
13 *Maze Arbitration, Arbiter Rosa Rodriguez, and Arbiter Scott Schomber; Miami-*
14 *Dade County, Florida.*
15 ○ Attorney hours/fees: 25.62 / \$9,743.00
16 ○ Paralegal hours/fees: 105.26 / \$14,955.00
17 ○ Total fees: \$24,698.33
18 ● *Billy Steedly v. Yax Ecommerce LLC; Cause No. 23-593-CA; Circuit Court of*
19 *the 3rd Judicial Circuit, in and for Columbia County, Florida.*
20 ○ Attorney hours/fees: 1.6 / \$522.50
21 ○ Paralegal hours/fees: 2.05 / \$550.00
22 ○ Total fees: \$597.50
23 ● *Phillip Stoops, Tina Luk, Phillip Harrinarine, Thomas Woodall, Jameson*
24 *Croney, John Cundiff, Dominic Camany, Haider Al Shaheed, Eric Bringley, Abram*
25 *Clark, Price Campbell, Milan Gacanovic, Tayor Hallock, Craig Dillehay, Marc*
26 *Feltman, Christopher Gross, Paul Latella, Kris Hanson, Korey McAleesejergins,*
27 *Kirk Hanson, Jeremy Harold, Jordan Heinrichs, Pat Overby, Andrew Hoge, Isabel*
28 *Ramos, Simon Reeves, Chris Roe, Aaron Jones, Jason Keith, Rick Mariano, Sanjiv*
 Tyagi, Shannon McAlister, Parveen McGhee, Tahmica McNair, Hayley Moulzolf,
 Robert O'Mahony, Olusegun Ososanya, Eduardo Calleja, Joesph Palka, Kathy
 Patton, Patrick Pfeiffer, Greg Junghans, Eric Robie, Jason Sandoval, Paul Savage,
 Teresa Shurtz, James Trammell Jr., Brenda Wethington, Julie Whalen, Kyle White,
 Jana McCoy, Justin Chambers, Trevor Willenberg, Jonathon Rivera, Mike
 Wimmer, William Wright, Brandon Young, Afshin Salehi, Arash Yousofi, Sharlene

1 *Reese, Kyle Zhang, and John Vorgitch v. Ryan Carroll, Max K. Day, Max O. Day,*
2 *Yax Ecommerce LLC, Precision Trading Group, LLC; WA Distribution LLC;*
3 *Providence Oak Properties, LLC; Quantum Leadership, LLC; Quantum Health,*
4 *LLC; Quantum Staffing, LLC; Quantum Distribution, LLC; Quantum Ecommerce,*
5 *LLC; Quantum Ecom, LLC; Quantum Capital Group, LLC; Quantum Marketing*
6 *Group, LLC; Wholesale Universe, Inc; Troy Marchand, Bonnie Nichols, WA*
7 *Amazon Seller, LLC; Daddy Jules, LLC; MKD Investment Advisor, LLC; MKD*
8 *Family Beneficiary, LLC; MKD Family Private Management Company, LLC; Max*
9 *Day Consulting, LLC; Houtex Farm Equity Partners, LLC; Business Financial*
10 *Solutions; Advisory, LLC; Evo Maxx, LLC; Yax IP and Management, Inc (D.B.A.*
11 *"Fullfillable"); Ecom Kickstarter, LLC; Nature Sourced, LLC; Cause No.*
12 *CIVSB2400076; Superior Court of the State of California for the County of San*
13 *Bernadino.*

14 Attorney hours/fees: 0.4 / \$140.00
15 Paralegal hours/fees: 3.73 / \$435.00
16 Total fees: \$575.00

17 • *Daryl Tanner v. Yax Ecommerce, LLC d/b/a Wealth Assistants, LLC; Case*
18 *No. 1232315; County Civil Court at Law No. 2; Harris County, Texas.*

19 • *Daryl Tanner v. Yax Ecommerce, LLC d/b/a Wealth Assistants, LLC;*
20 *American Arbitration Association Case No. 01-23-0005-5199.*

21 Attorney hours/fees: 23.29 / \$9,417.91
22 Paralegal hours/fees: 44.67 / \$6,900.83
23 Total fees: \$16,318.74

24 • *Wealth Assistants LLC v. Thread Bank v. John Bustamante; Steven Paul;*
25 *Michael Whitten; John Moore; and Christopher Tawil; Case No. 4:24-cv-00040;*
26 *United States District Court for The Southern District of Texas, Houston Division.*

27 Attorney hours/fees: 25.31 / \$10,323.34
28 Paralegal hours/fees: 60.97 / \$8,775.00
29 Total fees: \$26,853.00

30 • *State of Maryland Office of the Attorney General: Securities Division; Case*
31 *No. 2023-0362.*

32 Attorney hours/fees: N/A
33 Paralegal hours/fees: 0.6 / \$15.00
34 Total fees: \$15.00

- 80 Pre-Litigation Matters:
 - Attorney hours/fees: 142.07 / \$52,751.07
 - Paralegal hours/fees: 41.49 / \$4,402.50
 - Total fees: \$57,337.13
- 56 Creditor/Chargeback Responses with Exhibits:
 - Attorney hours/fees: N/A
 - Paralegal hours/fees: 7.7 / \$932.00
 - Total fees: \$932.00
- Employment matters:
 - Attorney hours/fees: N/A
 - Paralegal hours/fees: 1.3 / \$195.00
 - Total fees: \$195.00
- Intellectual Property:
 - Attorney hours/fees: 1.5 / \$750.00
 - Paralegal hours/fees: N/A
 - Total fees: \$750.00
- Other Transactional Matters:
 - Attorney hours/fees: 14.64 / \$10,275.00
 - Paralegal hours/fees: 16.03 / \$33.25
 - Total fees: \$13,600.00

5. I certify under penalty of perjury under the laws of Texas that the foregoing is true and correct to the best of my knowledge and belief.

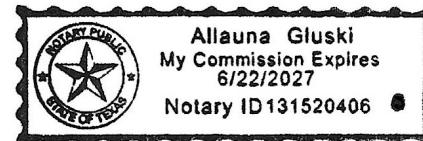
6. I declare under the laws of the State of California that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

Megan Matthees
MEGAN WEISS

1 SWORN TO AND SUBSCRIBED before me on this 8th day of January, 2025,
2 by Megan Weiss, who is personally known to me.

3 
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7 NOTARY PUBLIC, State of Texas

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11 My Commission Expires: JUNE 22, 2027

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16 **CERTIFICATE OF SERVICE**

17 I hereby certify that a true and correct copy of the foregoing document, and
18 any attachments, will be served to counsel of record, in accordance with the
19 governing rules of procedure regarding service in this court on this *January 9, 2025*,
20 via email as follows:

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/s/ William Shibley
William Shibley